

KING & SPALDING LLP
1185 AVENUE OF THE AMERICAS
NEW YORK, NY 10036

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
1285 AVENUE OF THE AMERICAS
NEW YORK, NY 10019

July 30, 2018

**VIA E-MAIL
AND ECF FILING**

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (MG)**

Update Regarding Potential Mediation with PIWD Plaintiffs

Dear Judge Glenn:

General Motors LLC (“New GM”) writes to advise the Court of additional developments since the July 19, 2018 hearing (the “July 19 Hearing”) concerning the potential mediation of personal injury claims asserted against New GM and/or the GUC Trust.

At the July 19 Hearing, New GM informed the Court that New GM and certain personal injury claimants represented by Goodwin Procter LLP, Hillard Martinez Gonzales L.L.P. and The Law Offices of Thomas J. Henry and Andrews Meyers, P.C. (collectively, the “PIWD Plaintiffs”) had been in active discussions to facilitate the mediation and potential settlement of Pre-Sale personal injury claims. (7/19/2018 Hr’g Tr. 39:23-40:20.) Moreover, New GM had requested the information and documentation supporting the personal injury claims set forth in MDL Order 148. As of the July 19 Hearing, a significant number of PIWD Plaintiffs had agreed to provide such information to New GM, with the remaining PIWD Plaintiffs still reviewing and considering New GM’s information requests. (*Id.* 40:21-25.)

New GM is pleased to report that all PIWD Plaintiffs who filed late claims as of the July 19 Hearing have agreed to provide the information and documentation requested by New GM.

Honorable Martin Glenn
July 30, 2018
Page 2

New GM intends to proceed as expeditiously as possible to voluntarily mediate the claims asserted by the PIWD Plaintiffs as of the July 19 Hearing after the requested information is received and evaluated by New GM.

Respectfully submitted,

/s/ Paul M. Basta

Paul M. Basta
Aidan Synnott
Kyle J. Kimpler
Sarah Harnett
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
1285 Avenue of the Americas
New York, New York 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

and

Arthur Steinberg
Scott Davidson
KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

Counsel for General Motors LLC